

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff,

Plaintiff,

v.

ABN AMRO BANK (IRELAND) LTD. (f/k/a/ FORTIS
PRIME FUND SOLUTIONS BANK (IRELAND)
LIMITED) and ABN AMRO CUSTODIAL SERVICES
(IRELAND) LTD. (f/k/a FORTIS PRIME FUND
SOLUTIONS CUSTODIAL SERVICES (IRELAND)
LTD.),

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05355 (CGM)

STIPULATION AND ORDER

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the estate of Bernard L. Madoff, individually, and defendants ABN AMRO Bank (Ireland) Ltd (f/k/a Fortis Prime Fund Solutions Bank (Ireland) Limited) and ABN AMRO Custodial Services (Ireland) Ltd. (f/k/a Fortis Prime Fund Solutions Custodial Services (Ireland) Ltd.) (together, “Defendants” and collectively, with the Trustee, the “Parties”), by and through their respective, undersigned counsel, hereby stipulate and agree in this Stipulation and Order as follows:

WHEREAS, Defendants have agreed to consent to the Trustee filing the Second Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED that the Stipulation and Order is as follows:

1. The Trustee will file the Second Amended Complaint on or before June 20, 2022.
2. Defendants will answer, move, or otherwise respond to the Second Amended Complaint on or before August 19, 2022.
3. The Trustee will file any opposition to Defendant’s motion on or before October 18, 2022.
4. Defendants will file any reply brief in support of its motion on or before December 2, 2022.
5. The Parties reserve all rights, arguments, objections and defenses they may have, and entry into this Stipulation and Order shall not impair or otherwise affect any such rights, arguments, objections, and defenses.

6. The above deadlines granted by this Stipulation and Order are without prejudice to either party seeking future extensions of time.

Dated: June 13, 2022
New York, New York

BAKER & HOSTETLER LLP

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*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC and the
Chapter 7 Estate of Bernard L. Madoff*

SO ORDERED.

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(Ireland) Ltd (f/k/a Fortis Prime Fund Solutions
Bank (Ireland) Limited) and ABN AMRO
Custodial Services (Ireland) Ltd. (f/k/a Fortis
Prime Fund Solutions Custodial Services
(Ireland) Ltd.)*

Dated: June 13, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge